

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

Mohamed Luhizo

_____))
Plaintiff(s),)

v.)

City of Burlington, et al)

_____))
Defendant(s).)

Case No. 2:20-cv-05

STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(2):

INTRODUCTION

1. In this case, discovery may be needed on the following subjects:

All claims and defenses raised in Plt's Complaint and Defs' Answer

Unless noted here to the contrary and in more detail, discovery in this matter shall not be conducted in phases or limited to particular, enumerated issues.

2. The parties have conferred about disclosure, discovery, and preservation of electronically stored information ("ESI"). Unless noted otherwise, ESI shall be produced in the following format(s): native format or .pdf.

3. The parties have conferred about claims of privilege and claims of protection as trial-preparation materials. The parties have agreed on the following procedure to assert these claims after production: privilege log.

Unless specifically requested in a filing with this court, the parties agreed procedure will not be the subject of a court order under Federal Rule of Evidence 502.

4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil

Procedure or the Local Rules for this District shall be specifically described below.

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before 05/01/2020.
6. The parties shall serve all interrogatories and requests for production on or before 08/01/2020.
7. Depositions of all non-expert witnesses shall be completed by 10/01/2020.
8. Plaintiff shall submit expert witness reports on or before 08/15/2020.
Depositions of plaintiff's expert witnesses shall be completed by 09/15/2020.
9. Defendant shall submit expert witness reports on or before 10/01/2020.
Depositions of defendant's expert witnesses shall be completed by 11/01/2020.
10. The Early Neutral Evaluation session shall be conducted on 9/1/2020 at 10:00 ☒ am ☐ pm. The parties have agreed that Michael Marks will serve as the early neutral evaluator. (Note: Paragraph 10 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)
11. The parties shall serve all requests for admission on or before 10/01/2020.
12. All discovery shall be completed by 12/01/2020 (no later than 8 months after filing of the Answer or Third-Party Answer).
13. Motions for joinder of parties and amendments to the pleadings shall be filed on or

before 06/01/2020

14. Motions, including summary judgment motions but excluding motions relating to the
conduct of the trial, shall be filed on or before 12/01/2020.

15. This case shall be ready for trial by 01/15/2021

3/16/20 /s/ Evan Chadwick

Date _____

Counsel for Plaintiff(s)

3/16/20 /s/ Pietro J. Lynn

Date _____

Counsel for Defendant(s)

APPROVED and SO ORDERED:

U.S. District/Magistrate Judge

Date: _____

Local Form/Rule 26(a)(3)